

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Docket No. 17-20489
Hon: Terrence G. Berg

-VS-

JASYMN ROMO,

Defendant.

_____/

MOTION FOR TRAVEL AND SUBSISTENCE AT GOVERNMENT EXPENSE

NOW COMES, Defendant, Jasmyn Romo by her attorney, Robert Kinney, CJA panel attorney, and moves this Honorable Court pursuant to 18 U.S.C. 4285, for and Order directing the U.S. Marshals to furnish the Defendant fare for transportation to the Eastern District of Michigan. The Defendant filed a supporting Brief and further states as follows:

1. The Defendant, is charge with One Count of Conspiracy to Distribute Controlled Substances 21 U.S.C. 846.
2. Bond conditions restrict Defendants travel outside of the Rialto, California area.
3. The Defendant with the consent of the Assistant United State Attorney, will appear in person on September 7, 2022, in the Eastern District of Michigan for a plea hearing.
4. Robert Kinney was appointed to represent the Defendant.
5. Defendant resides in Rialto, CA.
6. The Defendant is financially unable to provide the necessary transportation to appear in the Eastern District of Michigan.
7. The interests of justice would be served by ordering the U.S. Marshall to pay for a round trip air transportation and subsistence expenses.

8. Pursuant to LCR7.1, concurrence was sought, and assistant United States Attorney Andrea Hutting concurs in the request relief.

WHEREFORE, the Defendant respectfully request this Honorable Court to enter and order to that effect.

Respectfully SUBMITTED,

/s/ ROBERT F. KINNEY

Robert F. Kinney

Attorney for Defendant

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Attorney Bar No. P35428

Dated: August 8, 2022

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Case No.: 17-20489

HON. Terrance G. Berg

v.

JASYMN ROMO,

Defendant.

BRIEF IN SUPPORT OF
MOTION FOR TRAVEL AND SUBSISTENCE EXPENSES

This court has authority to order that Defendant's fare and subsistence expenses be paid pursuant to 18 U.S.C. §4285. That section provides:

Any judge or magistrate of the United States, when ordering a person released under chapter 207 on a condition of his subsequent appearance before that court, any division of that court , or any court of the United States in another judicial district in which criminal proceedings are pending , may when the interest of justice would be served thereby and the United States judge or magistrate is satisfied , after appropriate inquiry , that the Defendant is financially unable to provide the necessary transportation or furnish the fare for such transportation to the place where his appearance is required, and in addition may direct the United State Marshall to furnish that person with an amount of money for subsistence expenses to his destination, not to exceed the amount authorizes as a per diem allowance for travel under section 5702(a) of title 5, United States Code.

When so ordered, such expenses shall be paid by the marshal out of funds authorized by the Attorney General for such expenses.

Respectfully submitted,

/s/ ROBERT F. KINNEY

ROBERT F KINNEY (P35842)

615 Griswold St. Ste 1300

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(313) 963-5310

Dated: August 8, 2022

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Certificate of Service

I, herby certify that on August 9, 2022, I electronically filed the foregoing the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ Robert F. Kinney

ROBERT F. KINNEY (P35842)

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Case No.: 17-20489

HON. Terrence G. Berg

v.

JASYMN ROMO,

Defendant.

**ORDER FOR NON-CUSTODIAL TRAVEL EXPENSES AND TO TRAVEL
FROM THE SOUTHERN PART OF CALIFORNIA TO EASTERN DISTRICT OF
MICHIGAN**

Upon the application of Defendant, Jasymn Romo, for Travel Expenses, pursuant to 18 U.S.C. 4285, and the Court being apprised of Defendant's indigence and the Government concerning in the request;

IT IS HEREBY ORDERED that the U.S. Marshall furnish Defendant Jasymn with one way airfare, non-custodial air transportation from Rialto California (out of LAX Airport) to Detroit, Michigan for purpose of satisfying her plea hearing on September 7, 2022, 3:30 pm.

IT IS FURTHER ORDERED that the Defendant is permitted to leave the Southern District of California to travel to the Eastern District of Michigan for her plea hearing.

SO ORDERED:

/s/Terrence G. Berg

Hon: Terrence G. Berg

United States District Judge

Dated: August 11, 2022